

Objection Issues Summary - Monitoring

Objectors:

- **California Wilderness Coalition, California Native Plants Society and Center for Biological Diversity (CWC et al)** – Ryan Henson, Greg Suba, Lisa Belenky
- **California Chaparral Institute (CCI)** – Richard Halsey

Summary:

In general, the objectors see the monitoring alternative chosen in the San Bernardino National Forest's (SBNF) decision as inadequate.

CCI objects to the USFS's rejection of the development of a baseline for chaparral data that includes an historical analysis. They state "the USFS's rejection of our suggestion to develop a baseline for the remaining old-growth stands of chaparral because it involved changing goals,is not particularly compelling."

CWC et al objects to the reporting interval (5 years) and that recommended monitoring changes were not incorporated into alternatives, and particularly Alternative B resulting in monitoring not based on "science-based recommendations".

Review Team Analysis:

The SBNF appropriately applied the 1982 Planning rule requirements to "obtain and keep current inventory data appropriate for planning and managing the resources." Baseline/inventory chaparral data exists for the SBNF and it can be found in the 2006 SoCal LMP analysis. The SBNF has a clear, well-articulated strategy for the development of monitoring questions related to chaparral based on National Strategic Plan desired conditions and goals and objectives that will serve to inform an adaptive management process related to forest planning. No planning requirement exists for the development of a chaparral historical analysis.

SBNF also appropriately applied the 1982 Planning Rule monitoring and evaluation requirements for "periodic determination and evaluation of the effects of management practices..." (36 CFR 219.11 (d)); a quantitative estimate of performance; (36 CFR 219.12 (k)(1)); "documentation of the measured prescriptions and effects..." (36 CFR 219.12 (k)(2)); and "a description of ...the actions, effects, or resources to be measured, and the frequency of measurements" (36 CFR 219.12 (k)(4)(i)). Tables in Appendix 3 clearly display this required information. No particular periodicity of evaluation is required and the Forest used their discretion to determine that 5 years was an appropriate and cost effective reporting interval. This interval is the same interval as exists in the current LMP. In the FSEIS, the SBNF considered three monitoring alternatives including alternative C which provides for more intensive inventories and surveys than the current monitoring plan or alternative B. The SBNF considered

a full range of alternatives and including additional monitoring into alternative B would create a less distinct range of alternatives.

REMEDY(S) PROPOSED BY OBJECTORS

- We ask the Forest Service to consider revising the proposed decision to include more frequent monitoring and to adopt additional science-based monitoring protocols that will provide adequate information to managers regarding key resources in order to ensure resources are protected and adaptive management is utilized where needed. (CWC, CNPS & CBD)
- Reconsideration of the California Chaparral Institute's recommendation to develop a baseline for the remaining old-growth stands of chaparral that includes an historical analysis. (CCI)

INSTRUCTIONS BEING CONSIDERED

- No instruction are being considered at this time.